

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA

v.

KEITH SUFFRITI,

Defendant

) Criminal No. 20cr30038  
)

) Violations:  
)

) Counts One through Four: Distribution of Child  
) Pornography  
) (18 U.S.C. §§ 2252A(a)(2)(A) and (b)(1))  
)

) Count Five: Possession of Child Pornography  
) (18 U.S.C. §§ 2252A(a)(5)(B) and (b)(2))  
)

) Forfeiture Allegation:  
) (18 U.S.C. § 2253)  
)

INDICTMENT

COUNTS ONE THROUGH FOUR

Distribution of Child Pornography  
(18 U.S.C. §§ 2252A(a)(2)(A) and (b)(1))

The Grand Jury charges:

On or about each of the dates set forth below, in the District of Massachusetts, and elsewhere, the defendant,

KEITH SUFFRITI,

knowingly distributed and attempted to distribute, any child pornography, as defined in Title 18, United States Code, Section 2256(8), that had been mailed, and using any means and facility of interstate and foreign commerce shipped and transported in and affecting interstate and foreign commerce by any means, including by computer, as follows.

Count	Date (on or about)	Act of Distribution of Child Pornography
1	May 14, 2020	Transfer to multiple Kik users of IMG_0591.MP4

2	May 14, 2020	Transfer to multiple Kik users of IMG_0592.MP4
3	May 14, 2020	Transfer to multiple Kik users of IMG_0628.MP4
4	May 15, 2020	Transfer to multiple Kik users of GUJB3975.MP4

All in violation of Title 18, United States Code, Sections 2252A(a)(2)(A) and (b)(1).

COUNT FIVE  
Possession of Child Pornography  
(18 U.S.C. §§ 2252A(a)(5)(B) and (b)(2))

The Grand Jury further charges:

Between on or about May 14, 2020 and May 15, 2020, in the District of Massachusetts, the defendant,

KEITH SUFFRITI,

knowingly possessed material that contained one and more images of child pornography, as defined in Title 18, United States Code, Section 2256(8), that involved a prepubescent minor and a minor who had not attained 12 years of age, and that had been mailed, and shipped and transported using any means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce by any means, including by computer, and that was produced using materials that had been mailed, and shipped and transported in and affecting interstate and foreign commerce by any means, including by computer.

All in violation of Title 18, United States Code, Sections 2252A(a)(5)(B) and (b)(2).

FORFEITURE ALLEGATION  
(18 U.S.C. § 2253)

The Grand Jury further finds:

1. Upon conviction of one or more of the offenses in violation of Title 18, United States Code, Sections 2252A(a)(2)(A) and (b)(1) and 2252A(a)(5)(B) and (b)(2), set forth in Counts One through Five of this Indictment, the defendant,

KEITH SUFFRITI,

shall forfeit to the United States of America, pursuant to Title 18, United States Code, Section 2253, (i) any visual depiction described in sections 2251, 2251A, 2252, 2252A, 2252B, or 2260 of Chapter 110 of Title 18, or any book, magazine, periodical, film, videotape, or other matter which contains any such visual depiction, which was produced, transported, mailed, shipped, or received in violation of Chapter 110 of Title 18; (ii) any property, real or personal, constituting or traceable to gross profits or other proceeds obtained from such offenses; and (iii) any property, real or personal, used or intended to be used to commit or to promote the commission of such offenses or any property traceable to such property. The property to be forfeited includes, but is not limited to, the following:

a. Samsung Galaxy S9+ Cell Phone bearing serial number R38K307WTRJ.

2. If any of the property described in Paragraph 1, above, as being forfeitable pursuant to Title 18, United States Code, Section 2253, as a result of any act or omission of the defendant --

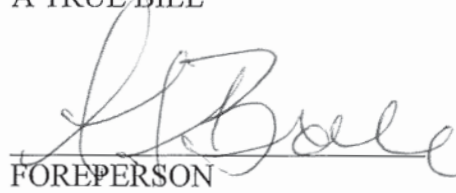
- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the Court;


- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty;

it is the intention of the United States of America, pursuant to Title 18, United States Code, Section 2253(b), incorporating Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendant up to the value of the property described in Paragraph 1 above.

All pursuant to Title 18, United States Code, Section 2253.

A TRUE BILL

  
FOREPERSON

  
ALEX J. GRANT  
ASSISTANT UNITED STATES ATTORNEY  
DISTRICT OF MASSACHUSETTS

District of Massachusetts: DECEMBER 15, 2020  
Returned into the District Court by the Grand Jurors and filed.

/s/ Noreen A. Russo  
DEPUTY CLERK



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